

FILED

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CLERK, U.S. DISTRICT COURT  
NORTH DISTRICT OF CALIFORNIA

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24 UNITED STATES DISTRICT COURT  
 25 NORTHERN DISTRICT OF CALIFORNIA

26 UNITED STATES OF AMERICA,

27 Plaintiff,

28 v.

29 PACIFIC GAS AND ELECTRIC  
 30 COMPANY,

31 Defendant.

32 No. CR 14-0175 WHA

33 SUPPLEMENTAL DECLARATION OF  
 34 THOMAS SCOTT HYLTON

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35 I, Thomas Scott Hylton, pursuant to 28 U.S.C. § 1746, declare the following under penalty  
 36 of perjury:

37 1. I have been retained by Baker & Hostetler, LLP as an expert witness for the  
 38 Official Committee of Tort Claimants (the "TCC") in connection with the Pacific Gas & Electric

1 ("PG&E") chapter 11 bankruptcy case (Case No. 19-30088 (DM)) and estimation proceedings  
2 (Case No. 19-05257 (JD)). All statements in this Declaration are based upon my personal  
3 knowledge developed during the course of my engagement with the TCC.

4 2. During the show cause hearing on February 19, 2020, the Court requested that I  
5 review high resolution photographs of Cresta-Rio Oso 230kV Transmission Line Tower 09/81  
6 taken by Defendant's drones. The Court further requested that I file a supplemental declaration  
7 concerning what I think should have been done with respect to the Tower 09/81 issues I  
8 identified, based on Defendant's additional inspection photographs.

9 3. As a preliminary matter, I would note that I agree with the Court's statement that  
10 the photographs supplied by Defendant are not as high quality as the photographs I took from the  
11 ground on December 9, 2019. That said, I was able to make several observations.

12 4. Photographs DJI\_0385, DJI\_0386, DJI\_0391, and DJI\_0392 show a single C-  
13 Hook with rust and considerable material loss on the C-Hook and/or connection plate. I cannot  
14 determine the specific amount of material loss without physically inspecting and measuring the  
15 equipment.

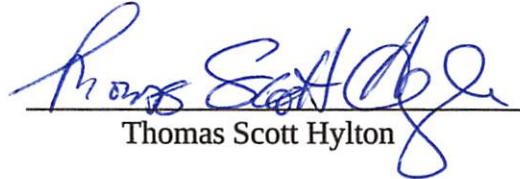
16 5. Photograph DJI\_0428 and DJI\_0446 show the C-Hook that has black electrical  
17 tape over roughly half of the hook. It raises a concern in my mind that no inspectors thought to  
18 remove this tape, as it would be impossible to determine the condition of the portions of the hook  
19 obscured by the tape with the human eye. I would be concerned that the hook may be cracked or  
20 otherwise degraded under the tape. In addition, the C-Hook and/or connection plate appear to  
21 have material loss and rust. In particular, photograph DJI\_0446 shows considerable rust on the  
22 connection plate.

23 6. Photographs DJI\_0436 and DJI\_0447 also show the C-Hook that has black  
24 electrical tape on it. The quality of the photographs is not as good as the others, but they appear to  
25 show significant material loss to the C-Hook and/or connection plate.

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7. To my knowledge, PG&E will be performing maintenance work as a part of their  
upcoming line clearance. I recommend replacement of the hanger plates and C-Hooks under  
PG&E's next scheduled maintenance clearance.

I declare under penalty of perjury under the laws of the United States of America that the  
foregoing is true and correct.

Dated: San Francisco  
February 25, 2020

  
Thomas Scott Hylton